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Appearing Pro Hac Vice  
Attorneys for Plaintiff(s)  
ANNA DUBROVA and DAVID SHAFRANSKIY,  
individually and as Successors In Interest to  
MIKHAIL SHAFRANSKIY, deceased,

FILED  
08 JAN -2 PM 12:15  
CLERK OF DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ANNA DUBROVA and DAVID  
SHAFRANSKIY, Individually and as Successors  
In Interest to MIKHAIL SHAFRANSKIY,  
deceased,

Plaintiffs,

v.

SAN FRANCISCO MARITIME (NATIONAL  
HISTORIC PARK), NATIONAL PARK  
SERVICE, U.S. DEPARTMENT OF THE  
INTERIOR, DOES 1 through 100, Inclusive.

Defendants.

CASE NO. CV07 5755 JL

Magistrate Judge: James Larson

**EX-PARTE APPLICATION FOR  
EXTENSION OF TIME TO SERVE AND  
CONTINUE INITIAL CASE  
MANAGEMENT CONFERENCE AND  
ADR DEADLINES**

Initial CMC Date: February 20, 2008-  
@10:30am (Courtroom F, 15<sup>th</sup> floor, SF)  
Complaint Filed: November 13, 2007

VICTOR LIPOVETSKY appearing *Pro Hac Vice* in this action; in support of this  
application hereby certifies on oath that:

- 1) I am an attorney licensed to practice law in the State of California.
- 2) I am the attorney of record for Plaintiffs ANNA DUBROVA and DAVID  
SHAFRANSKIY, Individually and as Successors In Interest to MIKHAIL SHAFRANSKIY,  
deceased, in this matter.
- 3) Service of Summons and Complaint with attendant papers has not been effectuated  
on the Defendants, SAN FRANCISCO MARITIME (NATIONAL HISTORIC PARK),  
NATIONAL PARK SERVICE, U.S. DEPARTMENT OF THE INTERIOR, and currently

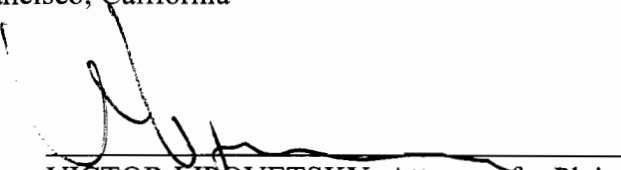
1 **is due on January 11, 2008, and no prior extensions have been obtained.**

2 4) Plaintiff requests a 90-day continuance of time to serve the complaint and  
3 accompanying documents as plaintiffs are trying to negotiate a settlement with the defendants  
4 for the amount of the medical bills only.

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6 5) In addition, in order to allow more time to settle the case prior to further litigation,  
7 plaintiffs request the Court reschedule the Initial Case Management Conference currently  
8 scheduled for **February 10, 2008, for 90 days and reschedule all ADR deadlines.**

9 " I declare under penalty of perjury under the laws of the State of California that the  
10 foregoing is true and correct and that this declaration was executed on

11 December 31, 2007, at San Francisco, California

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15 VICTOR LIPOVETSKY, Attorney for Plaintiffs,  
16 ANNA DUBROVA and DAVID SHAFRANSKIY  
17 Individually and as Successors in Interest to  
18 MIKHAIL SHAFRANSKIY, Decedent  
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